

EXHIBIT 87

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION
4 IN RE: NATIONAL *
5 PRESCRIPTION * MDL No. 2804
6 OPIATE LITIGATION * Case No.
7 _____ * 1:17-MD-2804
8 THIS DOCUMENT RELATES * Hon. Dan A.
9 TO ALL CASES * Polster

16 Videotaped deposition of DEANNA STACY AYERS
17 CHICK, held at the Law Offices of Robbins
18 Geller Rudman & Dowd, 3424 Peachtree Road, NE,
19 Suite 1650, Atlanta, Georgia, commencing
20 at 9:11 a.m., on the above date, before
21 Lois A. Robinson, Registered Diplomate
22 Reporter and Certified Realtime Reporter.

<p style="text-align: right;">Page 38</p> <p>1 called Avapro and Avalide. 2 Q Which is -- 3 A So these are angiotensin inhibitors; 4 Avapro and Avalide in particular. 5 Q Those were -- so were all the drugs 6 cardiovascular-related? 7 A Yes. And also -- I beg your 8 pardon -- in the metabolism side of the business, 9 I had responsibility for Lantus. 10 Q What was that? 11 A A basal insulin. 12 MR. CHALOS: 13 These are American problems, Peter. 14 Peter's Dutch. We are in America. 15 Q Okay. And, then, what else -- what did 16 you do after that? 17 A So I returned to the market access team 18 as vice president of account management. 19 Q Was that for the entire portfolio? 20 A Yes. 21 Q And then what? 22 A And then I was recruited to Archimedes. 23 And, so, I left Sanofi and joined Archimedes. 24 Q Did Sanofi make an opioid product while 25 you were with the company?</p>	<p style="text-align: right;">Page 40</p> <p>1 A Well, the product delivery system had 2 a -- a measured dosage approach which was in 3 place really to allow for a metered dose, to -- 4 Q Uh-huh. 5 A -- not allow, you know, more product to 6 be dispensed than intended, to prevent any -- any 7 type of -- or at least to deter any type of 8 attempted abuse or -- 9 And the way in which the product was 10 distributed, not only through the mechanism but 11 also through the -- a gel formulation that was 12 administered to the nasal cavity, also inhibited 13 absorption and metered that approach. 14 Q Do you recall any of the risks 15 associated with the Archimedes product? 16 MR. DAVISON: 17 Objection. 18 A Risks to -- with the Archimedes 19 product? 20 MR. CHALOS: 21 Q Yes, ma'am. 22 A Certainly, it, as a fentanyl product, 23 there were certain risks that would -- would 24 travel with the product. So because the product 25 could be abused in other forms, Archimedes took</p>
<p style="text-align: right;">Page 39</p> <p>1 A I don't believe so. 2 Q Okay. So what did -- when you joined 3 Archimedes, you were involved in the market 4 access function? Is that right? 5 A Yes. 6 Q Was that nasal fentanyl, was that their 7 sole product at that point? 8 A Yes. 9 Q That was your first experience with 10 opioids? 11 A Yes. 12 Q Did you receive any training when you 13 joined Archimedes specific to opioids? 14 A Not specific to opioids. I recall 15 being educated around the product itself. 16 Q Did you learn about the risks 17 associated with fentanyl at that point? 18 A So I learned about the risks associated 19 with the product in particular that we were 20 marketing. Yes. 21 Q What were the risks associated with the 22 Archimedes product that you recall? 23 A So I would have to go back and look at 24 the package insert to recall all of the risks. 25 Q Okay. Do you recall any of them?</p>	<p style="text-align: right;">Page 41</p> <p>1 special attention to the mechanism by which the 2 product was dispensed to -- to deter that kind of 3 abuse. 4 Q Was there a risk of addiction with that 5 product? 6 A Yes. 7 Q Did you, when you worked for 8 Archimedes, discuss the risks of the product with 9 the customers that you dealt with? 10 MR. DAVISON: 11 Objection to form. 12 A So I did not personally -- was not 13 personally responsible for customers. But in 14 engaging with account executives in their 15 customer interactions, yes, there were -- the 16 risks of the product were discussed, yes. 17 MR. CHALOS: 18 Q You, in your capacity at Archimedes, 19 dealt with -- did you deal with -- directly with 20 people from other entities, or were you solely 21 focused internally? 22 A So I dealt with people in other 23 entities. 24 Q Okay. And those -- and these other 25 entities were third-party payers, such as</p>

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1 insurance companies and people at CMS?	1 A Yes.
2 A Yes.	2 Q And then you received an MBA from
3 Q Right?	3 Rutgers in Newark, New Jersey? Sorry. In
4 A Yes.	4 Newark, New Jersey?
5 Q I'm sorry. I cut you off, I feel like.	5 A Yes.
6 A I wanted to mention that while I was	6 Q Did you -- do you have any education
7 hired to lead the market access function, in the	7 specific to any medical field?
8 course of my first year of employment there, I	8 A No.
9 was also asked to take on the sales	9 Q Did you take any courses regarding
10 responsibility as well.	10 pharmacology when you were in college or in
11 Q Okay. And to whom did you sell?	11 business school?
12 A So the sales representatives based in	12 A No.
13 the field sold to medical oncologists, radiation	13 Q Was there a focus of your MBA?
14 oncologists, and -- and those practices, and --	14 A Yes.
15 and hospital systems.	15 Q What was that?
16 Q What was your job? Were you the	16 A Finance.
17 manager of the sales representatives?	17 Q Since you finished your formal
18 A Vice president of sales and market	18 schooling, have you taken any courses related to
19 access, yes.	19 any medical subject?
20 Q Did the sales representatives report	20 A No, outside of professional training
21 directly to you?	21 provided by the companies I was employed by.
22 A They reported to region managers, who	22 Q And that professional training relates
23 reported in to me.	23 to the company's products? Is that right?
24 Q Is there a problem in the United States	24 A Yes.
25 today with opioid abuse?	25 Q What professional training have you had
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1 MR. DAVISON:	1 related to opioids? We -- we already talked
2 Objection to form.	2 about the Archimedes training that you had
3 A So I'm aware of issues associated with	3 specific to their product. Is that --
4 opioid abuse in the US through the news.	4 Let me back up.
5 MR. CHALOS:	5 What professional training have you had
6 Q What type of issues are you aware of?	6 related to opioids specifically?
7 A I'm aware of addiction issues.	7 A Product-specific training provided by
8 Q Any others?	8 my employer.
9 A No.	9 Q One example of that is the Archimedes
10 [REDACTED]	10 nasal fentanyl product?
11 [REDACTED]	11 A Yes.
12 [REDACTED]	12 Q Did you receive, when you worked at
13 [REDACTED]	13 Mallinckrodt, any training related to opioids?
14 [REDACTED]	14 A Yes. Product training specifically.
15 [REDACTED]	15 Q Okay. On which product?
16 [REDACTED]	16 A Xartemis XR in particular.
17 [REDACTED]	17 Q We're gonna talk about that one a lot.
18 [REDACTED]	18 It's X-A-R-T-E-M-I-S.
19 [REDACTED]	19 Oh. You already had it.
20 [REDACTED]	20 XR.
21 MR. CHALOS:	21 Any other products, opioid products,
22 Q Do you have any --	22 that you received training in connection with?
23 Well, let's go back to your education.	23 A I did have some training on Exalgo as
24 You were -- you received a bachelor of business	24 well.
25 administration from the University of Georgia; is	25 Q Any others?
that right?	

<p style="text-align: right;">Page 46</p> <p>1 A Not that I recall.</p> <p>2 Q Since you left Mallinckrodt, have you 3 had any professional responsibility for any 4 opioids products?</p> <p>5 A No.</p> <p>6 Q So how did you come to leave 7 Archimedes?</p> <p>8 A So the company single asset was 9 acquired by another company. At that same time, 10 I was being recruited by Mallinckrodt. So when 11 the company, Archimedes, dissolved its US 12 operation, I joined Mallinckrodt.</p> <p>13 Q Where was Archimedes based?</p> <p>14 A Bedminster, New Jersey.</p> <p>15 Q Was it affiliated with an international 16 company?</p> <p>17 A Yes.</p> <p>18 Q Where was that?</p> <p>19 A Company was based in Reading, England.</p> <p>20 Q Were you recruited by Mallinckrodt for 21 a specific position?</p> <p>22 A I was.</p> <p>23 Q What is that position?</p> <p>24 A I was recruited for the vice president 25 of market access and interviewed for that role</p>	<p style="text-align: right;">Page 48</p> <p>1 A That would have been in the summer of 2 2013. I joined the company in August of 2013, so 3 it would have been sometime in the preceding 4 months, June, July, in that time frame.</p> <p>5 Q Did you, during the course of the 6 discussion with Mr. Trudeau or at any point 7 before you actually began working for 8 Mallinckrodt, did you learn that there was 9 somebody already in the position of vice 10 president of specialty sales?</p> <p>11 A I didn't learn that until I arrived at 12 the company.</p> <p>13 Q That was Mr. Wickline?</p> <p>14 A Yes.</p> <p>15 Q Are you in touch with anyone with 16 Mallinckrodt -- I mean, other than the lawyers -- 17 have you been in touch with anyone at 18 Mallinckrodt since you left?</p> <p>19 A Since I left the company, I may have 20 had conversations. I don't recall specifically.</p> <p>21 Q Do you -- do you keep up with anyone 22 that you -- that works for Mallinckrodt?</p> <p>23 A Currently, no.</p> <p>24 Q What conversations do you think you had 25 after you left?</p>
<p style="text-align: right;">Page 47</p> <p>1 throughout. When I was interviewed by the CEO, 2 he asked me to consider the vice president of 3 specialty sales role. And that's the position I 4 assumed with Mallinckrodt.</p> <p>5 Q Who was the CEO at that point?</p> <p>6 A Mark Trudeau.</p> <p>7 Q Where did you interview with him?</p> <p>8 A In the company's headquarters in 9 Hazelwood, Missouri.</p> <p>10 Q Did you ever learn why they thought you 11 were appropriate for specialty sales rather than 12 market access?</p> <p>13 A In my discussion -- discussions with 14 executives, there was an appreciation for the 15 breadth of my experience in both market access 16 and in sales. It was at the time a bit unusual 17 to have someone who had the depth and breadth of 18 market access experience as well as sales 19 experience in -- at that level.</p> <p>20 Q Did your job with Mallinckrodt as vice 21 president of specialty sales, did that include a 22 market access component?</p> <p>23 A It did not.</p> <p>24 Q When did you interview with 25 Mr. Trudeau?</p>	<p style="text-align: right;">Page 49</p> <p>1 MR. DAVISON: 2 Objection to form.</p> <p>3 A So the division that I was part of was 4 dissolved, and, so, I was asked for things like 5 recommendations, job leads. So I engaged in some 6 of that -- that type of discussion.</p> <p>7 MR. CHALOS: 8 Q Did you have any friend- -- 9 friendship-type relationships with anyone at 10 Mallinckrodt?</p> <p>11 MR. DAVISON: 12 Objection to form.</p> <p>13 A Yes.</p> <p>14 MR. CHALOS: 15 Q And -- and none of them continued after 16 you left?</p> <p>17 A They did, though I -- I have not been 18 engaged recently with -- with anyone who's 19 currently employed by the company.</p> <p>20 Q Do you keep up with anyone who is a 21 former Mallinckrodt employee?</p> <p>22 A Yes.</p> <p>23 Q Who -- who do you keep up with?</p> <p>24 A Mark Sabella.</p> <p>25 Q How do you spell that one?</p>